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November 1, 2005

Ms. Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Re: In the Matter of: Nomination for Universal  
Service Administrator's Board of Directors  
CC Docket Nos. 97-21 and 96-45

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of October 3, 2005, DA 05-2648, the Rural Independent Competitive Alliance ("RICA") nominates R. Paul Waits for appointment as the member of the Board of Directors of the Universal Service Administrative Company ("USAC") representing competitive local exchange carriers.

Mr. Waits, a member of the RICA Board of Directors, is President of Ritter Communications Holdings, Inc. in Jonesboro, Arkansas where he is responsible for all communications businesses and business units affiliated with E. Ritter & Co., including its competitive local exchange carrier ("CLEC") operations. As shown in detail on the attached resume' Mr. Waits has not only had extensive experience in operating telecommunications business, but also has been deeply involved in regulatory and policy issues both in industry positions and as a regulator and Joint Board staff member. This broad experience makes him exceptionally well qualified to provide guidance to USAC during a period of potentially significant change.

Since inception of USAC, the CLEC Board Member position has been held by a representative of large and urban CLECs.<sup>1</sup> The current incumbent, Mr. Askin, is a very competent and dedicated representative and there are some areas of common ground between the two organizations. However, there is apparently no overlap in either membership or Board, and the interest of rural CLECs in the administration of USAC are substantially different from that of Comptel's members. Over 25% of

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<sup>1</sup> RICA has nominated candidates for the USAC Board on two previous occasions.

RICA's members have ETC designation and receive universal service support. Should the Commission's rules be revised as a result of current proceedings to provide support based on an ETCs own costs, that percentage would be expected to increase.

RICA members are primarily facilities based providers that have brought substantial improvements in telecommunications services to remote, high cost rural areas long neglected by the large incumbents which served them historically. The large per subscriber capital investments required to provide the supported services necessitates effective and efficient administration of the Universal Service support mechanisms. Mr. Waits' close involvement with rural telecommunications and his position as a member of the RICA Board make him ideally suited to contribute importantly to the USAC Board.

Please contact me with any questions regarding this nomination.

Respectfully submitted

Rural Independent Competitive Alliance

By/ David Cosson  
Its Attorney

Kraskin, Moorman & Cosson, LLC  
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Attachment

## RESUME'

R. Paul Waits, President  
Ritter Communications Holdings, Inc.  
3300 One Place  
Jonesboro, AR 72404  
870.934.3426  
[pwaits@rittermail.com](mailto:pwaits@rittermail.com)

### **Summary of Qualifications**

Over twenty years in telecommunications industry, including executive/general management, regulatory & legislative advocacy, intercompany contract and settlement negotiations, strategic planning, marketing information & technology, customer relationship management and new business development.

### **Professional Experience**

#### President, Ritter Communications Holdings, Inc. (1/2005—present)

Ritter Communications Holdings, Inc., Marked Tree & Jonesboro, Arkansas

Responsible for all communications businesses and business units owned and/or operated by E. Ritter & Co., including local exchange carrier (ILEC and CLEC), internet access, long distance, cable TV and cellular partnerships.

#### COO, Ritter Communications, Inc. (8/2001—12/2004)

Ritter Communications Holdings, Inc., Jonesboro, Arkansas

Responsible for incubating and managing new business initiatives; built CLEC/DLEC as part of edge-out strategy for independent telephone holding company. Deployed Class 5 softswitch; developed and executed communications integration strategy for business market; deployed VoIP technologies.

#### Principal, RP3 Group (2000-2001)

Independent consultant and informal consortium assisting telecommunications clients with business and marketing strategies, regulatory advocacy and financial analyses.

#### Telecommunications Consultant, Product Leader (1997-2000)

Acxiom Corporation, Conway, Arkansas

Industry specialist/consultant within the telecommunications group; responsible for solution development, strategic planning, business development and sales support as Acxiom extended its presence in communications sector, to which the company provided marketing information and automation systems, as well as customer relationship management strategies and technologies.

#### Vice President, Region II (1992-97)

Century Telephone Ent., Inc. (CenturyTel), Hardy, Arkansas

General manager of seven-state operating region for CenturyTel, including management of local exchange, long distance, carrier access and Internet access services, with functional responsibility for installation, repair, customer service, network design and construction, marketing and sales, external relations, and corporate network operations center.

Managed the major rebuild and reinforcement of the region's local distribution networks, which included complete conversion to digital switching and upgrade to single party service in all rural exchanges.

Managed the region's extension into long distance and Internet access services.

Provided leadership and advocacy in industry forums:

At the request of industry leaders in Arkansas, co-authored and was primary public spokesperson (legislative hearings, meetings, press interviews, etc.) for major reformation of telecommunications legislation, leading to the passage of the Arkansas Telecommunications Reform Act of 1997 (Act 77). Such legislation was in response to restructuring of industry after the passage of major federal legislation.

Participated in development of Federal Telecommunications Reform Act of 1996, and influenced the content of sections focused on Universal Telephone Service.

#### Vice President, Regulatory Affairs (1990-92)

Director, Regulatory Affairs (1987-90)

CenturyTel, Monroe, Louisiana

Responsible for regulatory advocacy, analysis and compliance before all state utility commissions and the FCC, as well as ad hoc negotiation of intercompany access and settlement arrangements.

Served on various state and national trade association committees and forums.

Presented formal testimony in numerous jurisdictions on such issues as emerging competition, revenue requirements, capital recovery, rate design and development, cost separations, universal service policies, access charge design, etc.

Successfully negotiated settlements in multiple regulatory disputes regarding intercompany compensation, pooling of access charges, rate of return investigations, rate relief, service availability/quality, rate design and capital recovery.

Managed group of regulatory and tariff analysts.

#### Manager, Telecommunications Section (1986-87)

Telecommunications Policy Analyst (1985-86)

Arkansas Public Service Commission, Little Rock, Arkansas

Responsible for Commission Staff advocacy in telecommunications rate proceedings, development of telecommunications policy, as well as compliance and auditing of rules and regulations.

Managed group of regulatory analysts and auditors.

Served on a FCC Federal-State Joint Board Staff that wrote rules for interstate cost separations and access charge development (Part 36).

Served on the NARUC Staff Subcommittee on Telecommunications.

Created and led a state-wide committee of industry and regulatory representatives to develop policy blueprint and access charge designs for the introduction of competition in long distance and to accommodate the restructure of the industry after the Divestiture of A.T.&T. Designed the Arkansas flat rate carrier common line pool for the distribution of local loop costs among long distance carriers.

#### Rate Analyst I, II and III (1982-85)

Arkansas Public Service Commission, Little Rock, Arkansas

Advanced from entry-level staff position, presenting formal testimony in various water, electric and telephone rate proceedings.

#### Education

Bachelor of Arts with Distinction in Economics and Business

Hendrix College, Conway, Arkansas (1976-80)

Attended law school at University of Arkansas at Little Rock.

Attended numerous seminars and workshops in regulatory advocacy, telecommunications, management and technology.

### **Communications**

Extensive writing, speaking and teaching experience, e.g., including the composition of formal testimony, comments, legislation, RFP responses, business plans, etc., as well as formal verbal presentations in regulatory and legislative hearings, seminars, industry forums, public forums, academic forums, press interviews, sales presentations, etc.